

EXHIBIT 2

STATE OF MICHIGAN
KENT COUNTY CIRCUIT COURT
17th CIRCUIT COURT

LORENE ROSKAMP, an individual
Michigan resident; DAVID ROSKAMP,
an individual Michigan resident; and
ELIZABETH MARCUS, an individual
Michigan resident,

Plaintiffs/Counter-Defendants,

v.

Case No. 22-07446-CZ
Hon. Christina Elmore

GRACE CHRISTIAN UNIVERSITY,
a Michigan nonprofit corporation;
JAMES PETER COOLEY, an individual
Michigan resident; and MORGAN MARIE
WOLFFIS, an individual Michigan resident,

Defendants/Counter-Plaintiffs.

Saura J. Sahti (P69627)
Jeffrey S. Appel (P28296)
CLANCY ADVISORS PLC
2723 S. State Street, Suite 150
Aim Arbor, MI 48104
T: (734) 7890-7595
E: sahu@clancvadvisors.com
Attorneys for Plaintiffs

Mark H. Zietlow (P37022)
MARK H ZIETLOW & ASSOCIATES
388 Garden Ave., Suite 140
Holland, Michigan 49424
T: (616) 392-4100
E: mark@innovative.lawyer
Attorneys for Defendants James Cooley
and Morgan Cooley

DEFENDANTS JAMES COOLEY AND MORGAN COOLEY'S

FIRST AMENDED COUNTER-COMPLAINT

NOW COMES Defendants/Counter-Plaintiffs James Cooley and Morgan Cooley (the "Cooleys"), by and through their attorneys, Mark H. Zietlow & Associates, PLC, and as their First Amended Counter-Complaint against Lorene Roskamp and David Roskamp (together the "Roskamps") and Elizabeth Marcus ("Marcus") (collectively the "Counter-Defendants") state as follows:

Jurisdiction and Venue

1. The Cooleys are residents of Allegan County, Michigan, and are parents and the guardians of their minor son Azariah. Azariah is under thirteen (13) years old.
2. Upon information and belief, Counter-Defendants reside in Kent County, Michigan.
3. This action is within the jurisdiction of this court.

Common Allegations

4. James Cooley met Elle Roskamp in the winter of 2017 in a worship night which was held in the studio at Grace Christian University. James and Elle got along really well and became friends. They became friends on Facebook in January 2018, prior to any events mentioned by the Roskamps and Marcus. James did not target Elle, at the time Burn 24.7 West Michigan did not even exist. Morgan and James had been friends since 2016 and shared an interest in music, attended worship schools together as well as traveled to ministry events. Morgan also joined James' band. At the time, James was Morgan's music assistant as she was and still is a music teacher.

5. It was only in February of 2018 that Burn 24.7 West Michigan was established, which was hosted monthly, weekly or sometimes daily. Burn 24.7 consisted of unending worship, prayer and adoration that lasted anywhere from 12 hours up to 100 hours non-stop. Teams representing churches across West Michigan took 1-2 hour shifts to worship, no group attended throughout the whole session.

Also at that time, Morgan decided to become an intern at Burn 24.7 where she could finish her internship hours due to a chronic illness that made it difficult to attend all the hours of her previous internship.

6. Morgan Cooley met Elle Roskamp on early March 2018 at a song writing workshop led by Morgan in a church which was captured in a video. They became really good friends. Morgan did not target Elle. In late March 2018, Morgan and James Cooley started dating to be married in August 2018.

7. Elle started to participate as a worship leader for Burn 24.7 on April 1, 2018 for 1 hour. This event was held partially at Newhouse of prayer and partially at Grand Rapids House of Prayer.

8. The event mentioned by Lorene Roskamp was held on April 6, 2018 when James was invited by the event coordinator Hamza Suassuna to fill in the role of emcee for the wake event. It was a 2-night event open to the public. Morgan was also present at the event as a worship leader for the Burn band. Elle participated of this event as sound and lights technician and also sang two songs. Upon information and belief, Elle was very social and engaged in social activities like this event.

9. James secured a job in August 2018, prior to marrying Morgan and prior to Elle moving in as a roommate. Once the Cooley's got married, Morgan moved from her mom's house in Wyoming, MI, and James moved from his parent's house in Caledonia, MI, to the house that lived at when Elle moved in April 2019. During that time, Elle was still highly sociable and participated in various social activities.

10. In January of 2019, Elle decided to become a member of the Burn leadership team before she eventually decided to do her internship with Burn 24.7. Elle, James, and Morgan started to play music together in a band at different churches in Grand Rapids. In February 2019, Elle helped organize a 100-hour burn. Elle was not an intern at this time, and she did not stay for the entire duration of the event.

11. In April 2019, James began his full-time employment at his current employer and has since then received a promotion. It is clear that Elizabeth Marcus' defamation saying that James was and is still unemployed is nothing more than a false and defamatory accusation.

12. During the Spring of 2019, Elle communicated to Morgan and James that she did not have a place lined up to live in the summer. Due to her friendship with the Cooleys, the Cooleys invited Elle to live with them and she chose to do so. Elle lived with the Cooleys from April 2019 to March 2020, when she chose to move for her own protection from her family members. Elle moved in with the Cooleys prior to the start of her internship with Burn 24.7.

13. Elle's internship began in May 2019, after the end of her junior year, when she received authorization from GCU to start her internship before the official start of Fall 2019 semester. Upon information and belief, Elle had to turn in timecards and description of the activities as an intern, which consisted of organizing events, scheduling musicians, hosting workshops, teaching, leading outreach. Soon after Elle's internship started, Morgan and James had a baby. There was not a moment when Elle's internship consisted of doing house chores or being a nanny. In fact, When Morgan had her son, she stopped teaching, gave many of her clients to Elle, and became a full-time caretaker for her son.

14. Upon information and belief, Elle hasn't lived with her family since 2017, by her own choice after she suspected that Lorene Roskamp was having an affair and tried to blackmail Elle but did not deny an affair.

15. Upon information and belief, after Elle had moved out and told David of her mom's suspected affair, David Roskamp told Elle he had bladder cancer in Elle's sophomore year, in an attempt to have Elle move back into their house which Elle refused to do. At this time Elle had no relationship with James and Morgan Cooley.

16. Upon information and belief, Elle's relationship with her parents was strained before meeting the Cooley's due to the problems in her family.

17. During the time that Elle lived with Cooley's, she maintained good grades, good sleeping schedule and a healthy diet. Elle and Morgan had a great friendship and would often talk about their lives to each other as any friends would do.

18. On June 23, 2019, James and Morgan's son was born. The Roskamp's make a clearly false accusation that Elle moved in to be a live-in maid and live-in nanny, as Elle moved in before the baby's birth.

19. During Elle's internship, James and Morgan believe Elle was always social and interacted with her friends and invited them over to her house to write songs with them. Elle did not recluse herself while living with the Cooley's. Elle liked to expand her friendships by participating in on campus activities. By July 2, 2019, Elle had already completed 118 out of 120 hours of her internship which was 8 days after James and Morgan's son was born. It would be impossible for Elle to have almost all her internship hours in 8 days if her internship consisted of being a live-in nanny. When Elle finished her internship, she decided to become a commuter student. she would begin commuting from the Cooleys' home in Holland, Michigan.

20. Lorene Roskamp falsely claimed that James and Morgan Cooley sleep deprived Elle. Upon information and belief, Elle was not sleep deprived and the Cooleys did not expect her to be awake at every moment or to be present at every event or even for the entire duration of an event. The Cooleys asked for volunteers, however, they were always clear that no one was obligated and if they needed time for themselves, it was fine.

21. During the time that Elle lived with the Cooleys, she was not prevented from talking or visiting her family. The Cooleys never tried to get in between Elle and her parents. They had no

knowledge of the length of the strain in Elle's relationship with her parents. Upon information and belief, she chose to distance herself due to family altercations and mistreatment from her family.

22. In October 2019, Elle's grandma passed away and Elle began to care for her mentally impaired aunt for a few days. The Cooleys did not get in between Elle and her family, she was free to make her own decisions and go wherever she wanted.

23. In early November 2019, Elle communicated to Morgan that she was remembering some abuses from her childhood, however, she still decided to go to Thanksgiving with her family. The Cooleys did not impede her or ask her to leave early as they were hosting Morgan's family at their house in Holland. There was no functional or practical reason why they would ask Elle to come back to the Cooleys residence.

24. Lorene Roskamp falsely claimed that James and Morgan made Elle do 40-day fasts, implying that Elle didn't eat anything for 40 days. That is simply false and slanderous. Elle did fasts that consisted of blended food, which she bought a specific blender for, smoothies, chocolates, etc. Elle did not go one day without food. James and Morgan did not manipulate Elle or tried to convince her to do anything. Elle's choice to do a fast that consisted of blended food with normal amount of calories had no relation to her internship.

25. Lorene and David claim Elle had delusional tendencies while growing up, however, upon information and belief, no treatment was ever sought by the family. Upon information and belief, Lorene was the one who was actually went to Pine Rest Clinic, for mental health services.

26. Morgan and James Cooley have not tried to influence Elle into believing they could interpret dreams as they believe only God can interpret dreams. In fact, Elle often sought to talk about her dreams and asked about the Cooleys' dreams, as a topic of conversation that any person who has had a dream that they can remember would. During conversations about dreams the Cooleys could suggest

what it meant or ask Elle what she thought it meant. There was never a talk about dreams of abuse as those dreams never happened. Elle was awake when she remembered moments of her childhood.

26. The Roskamps falsely accuse the Cooleys of performing dream interpretation and/or recovered memory theory and/or dream therapy and/or had visions about Elle's past. Claims made are very inconsistent and without any basis.

27. The Cooleys have not engaged in dream interpretation, recovered memory theory, dream therapy, or visions to convince Elle that her father had sexually abused her. Elle expressed she was having spontaneous and unprovoked memories about her childhood and Morgan listened as her friend. Morgan never offered any counseling, instead she encouraged her friend to seek professional help.

28. As Elle had memories from her childhood, she asked her family for space in a text message without explaining that it was due to her memories, and the exact opposite happened. In December of 2019, David and Lorene Roskamp enter Elle's and the Cooleys' home to forcefully attempt to take Elle back to their house as they yelled that she had to honor them. As Elle had the Cooley's baby in her arms and refused to leave. As she took the baby back to Morgan who was getting dressed, Lorene followed Elle into Morgan's bedroom and saw Morgan half-dressed and refused to move. David was yelling at James in the living room while he was trying to get ready to go to church for a prayer night. The Roskamps had no regard at all for the family and the baby.

29. As Morgan and Elle made their way to the car and locked the doors, David blocked the door impeding James from getting to the car until he eventually went back to his car. As the Cooleys and Elle drove away, they noticed that they were being followed by the Roskamps and Elle called the police and said they were being followed by her parents. At the police station, Elle was recommended to file a police report to report her memories. Elle chose not to do so because she wanted to deal with her memories and heal.

30. However, the Roskamps did not stop pursuing Elle and she filed a police report and talked about her memories. Elle filed for a personal protection order against her father which was initially granted by the Judge. Elle added locks to the house because she was afraid. In March of 2020, David fought the Personal Protection Order and had it set aside.

31. When Elle's senior year spring classes started, she decided to share pictures of her family to security in an attempt to not let her family come near her.

32. When David Roskamp had the Personal Protection Order set aside, Elle decided she was not safe and needed to move for protection, which she did. Elle moved and did not inform James or Morgan where she was moving to or her address. The Cooleys couldn't even reach her by phone anymore, as Elle had changed her number. The Cooleys had thought that this was the end of it, but it wasn't.

33. After David had the PPO set aside, Elle decided it was best for her to step away as a burn team and coordinator leader. It was also decided that Morgan and James' house was no longer a safe living situation, and Elle moved to another friend's house.

34. On March 18, 2019, a private investigator named Matthew Janiskee from West Michigan Solutions showed up to the Cooleys' residence looking for Elle. As there was nothing to see since Elle did not live there anymore. On or about March 19, 2020, David started to stalk the Cooleys by parking his car at their street and just sitting and watching the Cooleys. Sometimes he would go to a friend of Elle's house that was near to the Cooleys' house. In one instance, the Cooleys had left their son at this friends' house and David attempted to break into the house. David Roskamp came to the Cooleys' house on March 19, 2020, not long after the restraining order had been removed. Upon belief, he only knocked..

35. The Cooleys came to find out that Elle had moved to Florida in March after she contacted them saying her sister Elizabeth had found her.

36. Morgan Cooley was so frightened by David's actions that she could not sleep anymore. The Cooleys changed all the locks to their house and installed video cameras. An additional lock was installed inside of the couple's bedroom.

37. A lady called Diane Schrottenboer messaged James on Facebook inquiring about how to become a Burn member, however, that was a deceptive inquiry. Diane, on behalf of the Roskamps wanted to trick the Cooleys into giving evidence of where Elle was. Diane proceeded to harass the Cooleys on Facebook saying they had trafficked Elle and that Elizabeth was fantasizing about Elle's death.

38. In August 2020, the Cooleys learned that Elle has moved again because Diane had flown to Florida and accused Elle's new roommates of sex trafficking her and spreads those lies in Elle's church. Elle released a video on Facebook on August 1, before Diane came. Elle released another video to close friends, after Diane came. The second was sent to a select group of friends with permission to share with anyone who asked about her. Lorene in one of her public communications falsely accused James of scripting those videos and helping Elle make them. This is impossible as they were in different states.

39. On November 3, 2020, while the Cooleys' son was being watched by the Parmeter family, David Roskamp pulled up to their house and attempted to break into the house. The doors were locked and David attempted to open them, as well as the windows. Morgan and James were called to the Parmeter's house to try and make David leave. Eventually David left and the Parmeters filed an incident report.

40. In November 2020, Diane once again contacts James Cooley and tell him that Lorene has cancer, and that Elle should know because it was a life and death situation. James proceeds to tell Elle.

41. Diane proceeded to make a public statement on Burn 24.7 Facebook page falsely accusing the Cooleys as paranoid, involved in the disappearance of a Burntern and domestic partner, and act cult-like. The statement also includes words like polyamory and Ouija board. Diane acknowledges that Elle

was a sexual abuse victim and claims that Elle was involved in a polygamous relationship with James and Morgan. This is defamation of the Cooleys as it is not true.

42. In December 2020, James and Morgan received at their residence in Holland, MI, from private investigation firm West Michigan Investigation Solutions led by Matthew Janiskee informing them of the intent to investigate every area of James and Morgan's personal, professional, and social life. This was a clear intimidation attempt from the Roskamps. Also in December, James and Morgan start to receive letters at their mailbox. This letter was signed by "Judith" and asks what they would do if their son Azariah disappeared. The Cooleys have every reason to be terrified.

43. In January 2021, Morgan and James send a notarized letter to Lorene, David and their private investigator informing them that all communications to anyone in the Cooleys' community or themselves would be considered harassment as they do not wish contact. The Cooleys then bought cameras for their house due to an increase of hateful comments on Facebook, private messages and letters received. The Cooleys did not feel safe in their own house anymore.

44. Diane insisted on targeting the Cooley's and in March 2021, she shared that Elle is a missing person on Facebook. David, Lorene, and Elizabeth all endorse the statement. Elle sent a video stating that she was not a missing person and that she did not want any contact with her family. The video was sent to people to send out if anyone asked about her. Elle was not considered a missing person by the Police at that time. Diane's post incites other people to do the same and further the false accusations against the Cooleys, Burn 24.7 West Michigan and God girl ministries.

45. The first time that James makes a public statement is in March 24, 2021, where he addresses and states that there were false, slanderous, and defamatory statements made about him, his wife and Burn 24.7 West Michigan by a stranger. The stranger referred to is Diane Schrotenboer.

46. Also in March, 2021, former Grand Rapids Police officer John Riley messaged James Cooley on Facebook saying that he met with David Roskamp and David Roskamp claimed Morgan was probably the reason Elle turned against her family. This former police officer warned David Roskamp that if he continued to pursue aggressively, it would be his fault for the distance created.

47. In response to the statement made by Diane, Joel Groat, an executive director for the Institute for Religious research, reaches out to James to find more information. Joel states that one of their operational activities is to investigate cultish claims. He expresses that it seems to him that Elle is a person who desires some space, not a cult victim.

48. In March 2021, Elizabeth Marcus shares a false missing person's poster of Elle on Facebook. This was the first of many false public statements made by Elle's family. In fact, Elle was not a missing person or even considered to be by the police. This deceitful and misleading poster began a series of harassment the Cooley's would have to endure to this day and probably forever. The poster also states that Elle was last seen on August 29, 2020 which is inconsistent with other public statements the Roskamps and Marcus have made. Marcus then creates a post and names Burn 24.7 West Michigan organization and connects them to Elle. She acknowledges that Elle is an adult and says that she should speak for herself, which Elle has been all along.

49. The Roskamps did not stop harassing and falsely accusing the Cooleys. In April 2021, Ken Coulter of NBC 8 left a voicemail to James that David contacted him and said James was in a cult and is responsible for the disappearance of Elle. In April 13, 2021, people with cameras come onto Cooleys' residence, but made no contact.

50. In June 2021, Elizabeth Marcus created a go fund me campaign to raise money for a supposed documentary entitled "Where is Elle?". The campaign was supposed to raise \$170,000.00. It has

raised \$30,000.00 so far. This video has spread through social medias and has incited hate against the Cooleys. In this video, they show pictures containing the Cooleys' baby, showing his face.

51. With the community pressure increasing, Detective Stasiak opened a case to investigate if Elle is actually a missing person. In every communication with James, Detective Stasiak did not insinuate that the Cooleys are being investigated for murder as falsely claimed by the Roskamps in a public video. According to the Detective, the reason why the Cooleys were contacted was because their house was the last known official address of Elle.

52. Elle's name was placed as a missing person in August 2021, in the NAMUS database. This was the first and only time Elle was considered a missing person. Elle then worked with the FBI to respond in order to keep her living situation private.

53. In August 2021 Lorene went to Drenthe Christian Reformed Church to make false accusations and slander the Cooley's name. Lorene spoke what about where the Cooleys live to an estimated fifty-five thousand people that have viewed the video. In the video, Lorene makes false, slanderous, and inconsistent accusations that have deeply affected the Cooley's life. She makes statements referencing taking care of "your kids" even though Elle was already an adult at the time. The statement was designed to install fear in the minds of the listeners. After this video, the Cooleys felt obligated to move out of their house for two weeks as they were afraid of what people who believed Lorene's false accusations might do. Incited by Lorene's defamatory words, people on Facebook wanted to get a group and stand outside of the Cooleys' residence. However, they have since had to return home as they do not have sufficient money to move away.

54. What once felt as a safe house to live in, turned into a nightmare after the false accusations the Roskamps and third parties made against the Cooleys. There is now a constant door check to make sure all the doors are closed, cameras on the outside of the house. All because of the Roskamps' harassment

against the Cooleys. The Cooleys have a small child that does not get to play outside of the house.

55. The Cooley's started to lose worship partnerships after Lorene's live video Drenthe Christian Reformed Church. James continued to lose partnerships and was removed from the leadership team for Imago Dei, a prayer room, due to potential backlash from all the defamatory statements that had been made on the internet. James was then asked to take down any social media posting sharing the Awaken Generation's post. This was only one of many partnerships the Cooleys have lost due to the defamatory claims Lorene has made. The Cooley's did not attend their own Burn Event at Holland State Park, due to the intimidation and threats received because of Lorene's statements. Because of her statements, a group planned to protest against them at the event.

56. In September 2021, in a photo statement posted by Elizabeth Marcus on behalf of Lorene and David Roskamp, the Roskamp family acknowledged that Elle has responded through law enforcement. They also acknowledge in this post that she is alive. However, they go on to make other public statements fantasizing and publicizing Elle's death. Even though Elle was not a missing person, and in fact, alive and well, the Cooleys continued to suffer the consequences of the Roskamps' defamatory statements. James and Morgan, with approval from the Burn 24-7 West Michigan leadership team, made a public statement in response to the Drenthe Reformed Church video and the defamatory claims. They made clear that, police investigated and confirmed Elle is not a missing person, that they do not condone hateful and hurtful actions.

57. In December, 2021, the Roskamps and Elizabeth Marcus continued to make defamatory statements against the Cooleys on an update for the "Go Fund Me" campaign and celebrated the community intimidation that was put on James and Morgan. The Roskamps clearly incited the community to intimidate and make hateful comments.

58. Well into 2022, the Cooleys continue to be barred from even attending events. After organizing a Burn event with the Manna community, the Pastor of the community was contacted by Diane Lohr Schrotenboer and a person in the community to add pressure to not let James or Morgan attend event.

59. Elle created and released a YouTube video in August 2022 to make public her statement regarding everything that had been posted about her online. In the video, she states that she is safe, healthy, happy, and that she needed time on her own to process. She states she has been working with local law enforcement throughout this process and that she is not a missing person. Elle states that she does not wish to have contact with her family or any third party willing to speak on their behalf.

60. The Cooleys' Facebook messenger is now filled with threats, accusations, and questions about Elle because of the false accusations made by the Roskamps. Many people on Facebook accused James of being in a cult and manipulation because of the actions of the Roskamps. Not only the Cooleys but also their friends, family, Burn 24.7 organization have been constantly under attack. Anyone that stands with James and Morgan is attacked and harassed due to the defamation and false accusations made by the Roskamps and third parties.

61. Since then, if the name Morgan Cooley or James Cooley is searched on Google, instant results are connected to blogs about the Cooleys being in a cult who are behind the disappearance of Elle.

62. In 2021, the Cooleys started to attend a new church. The church has since received bad reviews on Google for allowing the Cooleys to be members there. That is the extent of the harassment the Roskamp's have caused in James and Morgan's life.

64. To the Cooleys' knowledge, at no point did the Roskamps file a police report against the Cooleys for sex trafficking their daughter or being the authors of her disappearance. They simply made defamatory accusations that have deeply affected the Cooleys' lives in negative ways.

65. In August of 2022, as they filed a lawsuit, the Roskamps did an interview with Fox 17 that contains innumerable inconsistencies with their previous versions of events. It is clear that the Roskamps are conducting a real witch hunt against the Cooleys without any proof.

66. Once again, the news article was shared on Facebook, spreading more false accusations against the Cooleys. Although Elle met with the FBI herself, lies are still being spread by the Roskamp's and Marcus' that she is merely "allegedly" alive.

67. The Roskamps have now incited one of Elle's former roommates in a safehouse, Adriece Joy, to send letters, reach out on Facebook, and email to the Cooleys, Elle, and to Elle's friends. The letters contain defamatory claims as well as statements saying the Cooleys are not responsible. She states that Elle is a liar and is fooling everyone. That is clearly not true as the Roskamps have gone to extreme measures to harass Elle, the Cooleys and anyone who sides with them. The Cooleys have never responded to Adriece.

68. On October 20, 2022, Adriece Joy, who, upon information and belief does not live in the state of Michigan, showed up at the Cooleys' residence, knocked on the door and left the same letters she has sent on Facebook and email. The Cooleys have not shared their address with Adriece or desired to meet with her.

69. James and Morgan are fearful of what one of Lorene's followers might do to them. The Roskamp's have taken away the Cooleys' fundamental right of privacy.

Count I
Defamation

70. The Cooleys incorporate by reference the foregoing paragraphs.

71. The Roskamps have made accusations about the Cooleys that are materially false.

The materially false statements include but are not limited to:

- A. That the Cooleys made Elle Roskamp worship at a time;
- B. That the Cooleys made Elle Roskamp not eat for 40 days;
- C. That the Cooleys had Elle Roskamp be their nanny;
- D. Such other and further statements listed above, and which become known during the course of discovery in this matter.

72. The Roskamps published the materially false remarks to third parties with knowledge of the falsity of the statements or in reckless disregard of their truth or falsity.

73. The Roskamps published materially false remarks to third parties with reckless disregard of their truth or falsity, claiming that they heard the statements from third parties, which statements included but are not limited to:

- A. That the Cooleys are murderers;
- B. That the Cooleys are human traffickers;
- C. That the Cooleys are cult leaders;
- D. Such other and further statements listed above and which become known during the course of discovery in this matter.

74. David Roskamp spoke and endorsed the materially false statements in the "Where is Elle" video and GoFundMe statement.

75. Elizabeth posted materially false updates on behalf of David and Lorene Roskamp.
76. Elizabeth publicly made false accusations about the Cooleys.
77. The foregoing accusations are materially false;
78. The accusations have harmed the Cooleys' reputation.
79. The publication of these remarks has resulted in damage to the Cooleys' reputation

in the community and economic loss, including, but not limited to, the following:

- A. emotional distress
 - B. humiliation, mortification, and embarrassment
 - C. sleeplessness and anxiety
 - D. other damages that may arise during the course of discovery and the course of this trial
81. Many of Lorene Roskamp's accusations were defamation *per se*.

Wherefore, the Cooleys request that:

- A. The Roskamps be ordered to immediately remove all media posts relating to the Cooleys and the issues alleged in their Complaint;
- B. The Roskamps issue a public apology to the Cooleys;
- C. The Cooleys be awarded damages as are appropriate;
- D. The Cooleys be awarded reasonable attorneys fees and costs;
- E. The Cooleys be awarded sanctions as a result of the Roskamp's false and frivolous Complaint;

- F. The Cooleys be granted a preliminary injunction enjoining the Roskamps from violating the Cooleys' rights during the pendency of this action
- G. The Cooleys be granted a permanent injunction enjoining the Roskamps from violating the Cooleys' rights as alleged in this Counter-Complaint;
- H. The Cooleys be awarded such other and further relief as is just and equitable under the circumstances.

Count II
Intentional Infliction of Emotional Distress

- 82. The Cooleys incorporate by reference the foregoing paragraphs
- 83. David Roskamp caused or allowed the news (Ken Coulter) and third party to the Cooleys' house without their consent.
- 84. David and Lorene Roskamp trespassed into the Cooleys' home while their minor son Azariah was there.
- 85. David Roskamp continued to come to the Cooleys' house knowing he was not permitted.
- 86. David Roskamp trespassed and attempted to enter a neighbor's home while the Cooleys' son Azariah was there.
- 87. By virtue of the foregoing, the Roskamps have invaded the privacy of the Cooleys.
- 88. The Roskamps have published videos with the Cooleys' minor son Azariah on them without consent of the Cooleys.

89. The Roskamps' conduct as alleged above was intentional.

90. The Roskamps' conduct as alleged above was extreme, outrageous, and of a character not to be tolerated by a civilized society.

91. The Roskamps' conduct as outlined above was for an ulterior motive or purpose.

92. The Roskamps' conduct resulted in severe and serious emotional distress.

93. As a direct and proximate result of the Roskamps' conduct, the Cooleys have been damaged in the manner outlined above.

Wherefore, the Cooleys request that:

- A. The Roskamps be ordered to immediately remove all media posts relating to the Cooleys and the issues alleged in their Complaint;
- B. The Roskamps issue a public apology to the Cooleys;
- C. The Cooleys be awarded damages as are appropriate;
- D. The Cooleys be awarded reasonable attorneys fees and costs;
- E. The Cooleys be awarded sanctions as a result of the Roskamps' false and frivolous Complaint;
- F. The Cooleys be granted a preliminary injunction enjoining the Roskamps from violating the Cooleys' rights during the pendency of this action
- G. The Cooleys be granted a permanent injunction enjoining the Roskamps from violating the Cooleys' rights as alleged in this Counter-Complaint;
- H. The Cooleys be awarded such other and further relief as is just and equitable under the circumstances.

Count III
Invasion of Privacy

94. The Cooleys incorporate by reference the foregoing paragraphs.

95. The Cooleys' home and personal life are personal and private to them.

96. The Cooleys' have the right to keep their home and personal life private.

97. By virtue of the foregoing, Lorene Roskamp and David Roskamp intruded into the Cooleys' home.

98. By virtue of the foregoing, Lorene Roskamp and David Roskamp intruded into the personal lives of the Cooleys.

99. By virtue of the foregoing, Elizabeth Marcus intruded into the personal lives of the Cooleys.

100. The Roskamps' and Marcus's actions in intruding on the Cooleys' right to privacy were highly offensive to the Cooleys and would be highly offensive to a reasonable person.

101. The Roskamps' and Marcus's invasion of the Cooleys privacy caused the Cooleys to suffer extreme emotional distress and humiliation.

Wherefore, the Cooleys request that:

- A. The Roskamps be ordered to immediately remove all media posts relating to the Cooleys and the issues alleged in their Complaint;
- B. The Roskamps issue a public apology to the Cooleys;
- C. The Cooleys be awarded damages as are appropriate;
- D. The Cooleys be awarded reasonable attorneys' fees and costs;

- E. The Cooleys be awarded sanctions as a result of the Roskamp's false and frivolous Complaint;
- F. The Cooleys be granted a preliminary injunction enjoining the Roskamps from violating the Cooleys' rights during the pendency of this action
- G. The Cooleys be granted a permanent injunction enjoining the Roskamps from violating the Cooleys' rights as alleged in this Counter-Complaint;
- H. The Cooleys be awarded such other and further relief as is just and equitable under the circumstances.

Count IV
Trespass

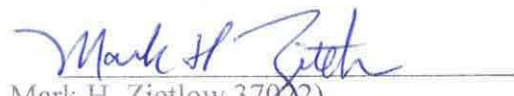
- 102. The Cooleys incorporate by reference the foregoing paragraphs.
- 103. At the time the Roskamps intruded into the home of the Cooleys, the Cooleys were in possession of the premises where they lived.
- 104. By virtue of the foregoing, the Roskamps invaded the premises occupied by the Cooleys.
- 105. By virtue of the foregoing, the Roskamps intended to enter the premises occupied by the Cooleys.
- 106. By virtue of the foregoing, the Roskamps wrongfully invaded the premises occupied by the Cooleys.
- 107. The Roskamps' invasion of the Cooleys' premises caused the Cooleys to suffer extreme emotional distress and humiliation.
- 108. By virtue of the foregoing, the Roskamps trespassed into the premises occupied by the Cooleys.

Wherefore, the Cooleys request that:

- A. The Roskamps be ordered to immediately remove all media posts relating to the Cooleys and the issues alleged in their Complaint;
- B. The Roskamps issue a public apology to the Cooleys;
- C. The Cooleys be awarded damages as are appropriate;
- D. The Cooleys be awarded reasonable attorneys fees and costs;
- E. The Cooleys be awarded sanctions as a result of the Roskamp's false and frivolous Complaint;
- F. The Cooleys be granted a preliminary injunction enjoining the Roskamps from violating the Cooleys' rights during the pendency of this action
- G. The Cooleys be granted a permanent injunction enjoining the Roskamps from violating the Cooleys' rights as alleged in this Counter-Complaint;
- H. The Cooleys be awarded such other and further relief as is just and equitable under the circumstances.

Respectfully submitted,

MARK H. ZIETLOW & ASSOCIATES



Mark H. Zietlow 37022)
388 Garden Ave, Ste 140
Holland, Michigan 49424
(616) 392-4100
Attorneys for Defendants Cooleys